UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BANERTEK LLC, Plaintiff, v. TANGOME, INC., Defendant.	Civil Action No. 2:16-cv-00839-JRG-RSP JURY TRIAL DEMANDED

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Banertek LLC ("Plaintiff"), and Defendant TangoMe, Inc. ("Defendant") hereby file this Joint Motion to Stay All Deadlines and Notice of Settlement, and in support thereof respectfully show the Court as follows:

All matters in controversy between Plaintiff and Defendants have been settled in principle. The parties are in the process of finalizing the terms of a written settlement agreement.

The parties wish to conclude the settlement without burdening the Court with any additional filings and without incurring unnecessary expense. The parties anticipate that they will be able to finalize the written settlement agreement and submit dismissal papers within approximately 30 days.

Accordingly, Plaintiff and Defendants jointly and respectfully request that the Court grant a stay of the proceedings between them, including all deadlines, until Tuesday, November 15, 2016.

The parties submit that good cause exists for granting this agreed motion, as set forth above.

This motion is not filed for purposes of delay, but so that justice may be served. A proposed order granting this Joint Motion is attached.

Wherefore, Plaintiff and Defendant respectfully request that the Court enter the proposed order submitted with this Motion as set forth above, and grant the parties such other and further relief to which they are entitled.

Dated: October 18, 2016

Respectfully submitted,

By: */s/ Bijal V. Vakil*
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CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on October 18, 2016, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by First Class U.S. Mail on this same date.

/s/ Bijal V. Vakil
Bijal V. Vakil